

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
STARMARIE EBONY JONES,

Defendants.

Case No. 1-19-cv-01301-WMR

JOINT MOTION FOR EXTENSION OF DEADLINES

Plaintiff Belcalis Marlenis Almánzar (“Plaintiff”) and Defendant Latasha Transrina Kebe (“Ms. Kebe”) respectfully submit this Joint Motion for Extension of Deadlines in this matter, and provide as follows:

1. On August 26, 2019, the parties filed their Joint Preliminary Report and Discovery Plan (the “Discovery Plan”) in this action. (ECF No. 17.) The parties have been operating pursuant to the Discovery Plan’s directives and deadlines, as extended by subsequent Orders of this Court.
2. Plaintiff propounded written demands on October 4, 2019, and Ms. Kebe served written responses on November 16, 2019 and certain

responsive documents on December 3, 2019. Kebe propounded written demands on February 9, 2020.

3. The parties previously sought, and the Court granted, prior extensions of the case deadlines due to significant disruptions caused by the current pandemic, including health issues and travel restrictions faced by the parties and their counsel.
4. The parties are actively engaged in discovery production as expeditiously as possible in light of the disruptions caused by the COVID-19 pandemic and the various travel restrictions.
5. Plaintiff has already served Ms. Kebe with thirty-four volumes of document production and still has additional volumes that are being produced within the next two weeks.
6. The parties have also been working together in good faith to cure various discovery deficiencies. Following a written letter outlining the issues that was sent by Plaintiff's counsel on September 15, 2020, the parties met and conferred regarding certain discovery deficiencies in Kebe's production and written responses on September 29, 2020. Counsel for Defendant have represented that they intend to produce additional documents and provide supplemental written responses to

the discovery demands and interrogatories and have agreed to cure all of the deficiencies outlined by Plaintiff. Pursuant to that discussion, Ms. Kebe is currently gathering evidence to supplement her initial production. Due to their workload, counsel for Kebe has stated that they will be able to provide those supplements by October 30, 2020.

7. Counsel for both parties agreed that another phone conference will be scheduled to discuss deficiencies, if any remain, with Plaintiff's discovery once Plaintiff's production is complete.
8. Additionally, Plaintiff noticed Ms. Kebe for deposition, which was tentatively scheduled for October 23, 2020, but based upon the aforementioned timeline of Defendant's supplemental production may need to be re-scheduled.
9. Plaintiff has also served subpoenas for document production and deposition on Defendant's husband Cheickna Kebe, who was listed as a witness in Defendant's interrogatory responses as Ms. Kebe's business manager. Mr. Kebe's responsive documents are currently due on or before October 19, 2020, and his deposition was noticed for October 22, 2020, provided Mr. Kebe has produced documents in advance of that date.

10. Additionally, Plaintiff is working to serve subpoenas on certain non-parties that Kebe claimed to obtain information from that are very important to the issues in this action. However, this process has been delayed as the parties have very little contact information for certain of these individuals and as such it has taken Plaintiff time to locate some of them, particularly in light of the pandemic.
11. Also, Plaintiff has notified Kebe of her intention to seek to amend the complaint to include additional (and only recently discovered) alleged defamatory statements that Kebe has made about Plaintiff during the pendency of this action, and Kebe has consented to this amendment. The additional statements are very similar to those in the current complaint, and thus it would be inefficient to require them to be alleged in a new lawsuit. Plaintiff has already started producing documents relevant to these allegations, but Kebe may nonetheless require additional time in discovery as a result of these allegations.
12. The current deadlines are as follows:
 - (a) the deadline for all parties to complete discovery and file discovery motions, including but not limited to motions to compel, is October 30, 2020; and

(b) the deadline for all parties to file motions for summary judgment is November 30, 2020.

13. Due to the ongoing discovery production and additional time that is needed, the parties seek additional time to complete and review discovery, to schedule depositions after the aforementioned supplementations are complete, and to file discovery motions. The parties do not have enough time to complete production, review the produced evidence, and file discovery motions by the current deadline.
14. In addition, on September 28, 2020, the Eighth Amendment to General Order 20-01 was filed, which extended the suspension of jury trials in the Northern District of Georgia through January 3, 2021; therefore, granting an extension will not delay this case from proceeding to jury trial, which was demanded by both parties.
15. Accordingly, the parties respectfully request the deadlines be extended as follows:
 - (a) the deadline for all parties to complete discovery and file discovery motions, including but not limited to motions to compel, be extended to December 14, 2020; and

(b) the deadline for all parties to file motions for summary judgment be extended to January 14, 2021.

16. A proposed order has been submitted with this motion.

Dated: October 16, 2020

Respectfully submitted,

/s/Olga Izmaylova

Olga Izmaylova (Bar No. 666858)
Sadeer Sabbak (Bar No. 918493)
SABBAK & IZMAYLOVA, P.C.
1875 Old Alabama Road, Suite 760
Roswell, Georgia 30076
(404) 793-7773

Attorneys for Ms. Kebe

/s/Sarah M. Matz

Sarah M. Matz (admitted *pro hac vice*)
Gary P. Adelman (admitted *pro hac vice*)
ADELMAN MATZ P.C.
1173A Second Avenue, Suite 153
New York, New York 10065
Telephone: (646) 650-2207
E-mail: sarah@adelmanmatz.com
E-mail: g@adelmanmatz.com

Lisa F. Moore (Bar No. 419633)
W. Andrew Pequignot (Bar No. 424546)
MOORE PEQUIGNOT LLC
887 West Marietta Street, Suite M-102
Atlanta, Georgia 30318
Telephone: (404) 748-9596

E-mail: lisa@themoorefirm.com
E-mail: andrew@themoorefirm.com

Attorneys for Plaintiff

CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14, a font and point selection approved by the Court in Local Rule 5.1(C).

DATED: October 16, 2020

/s/Olga Izmaylova

Olga Izmaylova

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2020, I electronically filed the foregoing JOINT MOTION FOR EXTENSION OF DEADLINES with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/Olga Izmaylova

Olga Izmaylova